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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TRUSTEES OF THE BRICKLAYERS &  
ALLIED CRAFTWORKERS LOCAL 13  
DEFINED CONTRIBUTION PENSION  
TRUST FOR SOUTHERN NEVADA;  
TRUSTEES OF THE BRICKLAYERS &  
ALLIED CRAFTWORKERS LOCAL 13  
HEALTH BENEFITS FUND; TRUSTEES OF  
THE BRICKLAYERS & ALLIED  
CRAFTWORKERS LOCAL 13 VACATION  
FUND; BRICKLAYERS & ALLIED  
CRAFTWORKERS LOCAL 13 NEVADA;  
TRUSTEES OF THE BRICKLAYERS &  
TROWEL TRADES INTERNATIONAL  
PENSION FUND; TRUSTEES OF THE  
BRICKLAYERS & TROWEL TRADES  
INTERNATIONAL HEALTH FUND; and  
TRUSTEES OF THE INTERNATIONAL  
MASONRY INSTITUTE,

Plaintiffs,

v.

PEGASUS MARBLE, INC., a Nevada corporation;  
CYGNUS, LLC, a Nevada limited liability company;  
and GAGIK ZARGARYAN, individually,

Defendants.

Case No. 2:20-cv-00224-GMN-BNW

**STIPULATION TO EXTEND**  
**DEFENDANTS' RESPONSE TO**  
**MOTION TO DISMISS**  
**DEFENDANTS' COUNTERCLAIM**  
**AND**  
**DEFENDANTS' RESPONSE TO**  
**MOTION TO STRIKE**  
**AFFIRMATIVE DEFENSES**

**STIPULATION TO EXTEND DEFENDANTS' RESPONSE TO MOTION TO DISMISS  
DEFENDANTS' COUNTERCLAIM AND DEFENDANTS' RESPONSE TO  
MOTION TO STRIKE AFFIRMATIVE DEFENSES**


Defendants Pegasus Marble, Inc., Cygnus, LLC, and Gagik Zargaryan, (hereinafter referred to collectively as "Defendants"), by and through their counsel of record, Adam Levine, Esq. of the Law Office Of Daniel Marks and Plaintiffs Trustees Of The Bricklayers & Allied Craftworkers Local 13 Defined Contribution Pension Trust For Southern Nevada; Trustees Of The Bricklayers & Allied Craftworkers Local 13 Health Benefits Fund; Trustees Of The Bricklayers & Allied Craftworkers Local 13 Vacation Fund; Bricklayers & Allied Craftworkers Local 13 Nevada; Trustees Of The Bricklayers & Trowel Trades International Pension Fund; Trustees Of The Bricklayers & Trowel Trades International Health Fund; And Trustees Of The International Masonry Institute (hereinafter referred to collectively as "Plaintiffs"), by and through their counsel of record, Nathan R. Ring, Esq. of the Urban Law Firm, and hereby stipulate and agree to extend the time for Defendants to file their Response to Plaintiffs' Motion to Dismiss Defendants' Counterclaim and their Response to Plaintiffs' Motion to Strike Affirmative Defenses for a period of 30 days from their current due date of June 17, 2020 through and including **July 17, 2020**. This stipulation is entered into in good faith and not for purposes of delay.

DATED this 18th day of June, 2020. DATED this 18th day of June, 2020

LAW OFFICE OF DANIEL MARKS	THE URBAN LAW FIRM
<u>/s/ Adam Levine, Esq.</u>	<u>/s/ Nathan R. Ring, Esq.</u>
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Attorneys for Defendants	Attorneys for Plaintiffs

**IT IS SO ORDERED.**

Dated this 18 day of June, 2020.

  
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Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT